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9 Attorney for Plaintiff
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11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

| | | | |
|----|--|---|---------------------------------|
| 13 | ATHIL STEPHAN SHABA, |) | Case No. 08CV0343 JM (BLM) |
| 14 | Plaintiff, |) | |
| 15 | v. |) | JOINT MOTION TO EXTEND TIME FOR |
| | |) | FILING OF RESPONSIVE PLEADING |
| 16 | PAUL PIERRE, District Director, U.S.) |) | |
| | Citizenship and Immigration Services, et al.,) |) | [Fed. R. Civ. P. 6(b)(1)] |
| 17 | |) | |
| 18 | Defendants. |) | |
| 19 | _____ |) | |

20 COME NOW THE PARTIES, Petitioner Athil Stephen Shaba, by and through his counsel, Alan
21 M. Anzarouth, and Defendants Paul M. Pierre, et al., by and through their counsel, Karen P. Hewitt,
22 United States Attorney, and Raven M. Norris, Assistant United States Attorney, hereby jointly move
23 the Court to extend the time for filing of Defendants' responsive pleadings. The parties are working
24 toward an extrajudicial resolution of Plaintiff's complaint, and the parties have agreed that additional
25 time is required before Defendants' filing of any responsive pleading in order to pursue resolution of
26 Plaintiff's claims without the intervention of the Court.

27 In an effort to resolve Plaintiff's complaints and without waiving Defendants' rights to defend
28 the causes of actions and allegations, including the right to file any Fed. R. Civ. P. 12 motions to
dismiss, the parties now jointly request this extension of time. Accordingly, the parties jointly request

1 that the Court extend the date upon which Defendants' responsive pleadings are due until June 24, 2008.

2 The parties have not previously requested an extension of time.

3 Based upon the foregoing, it is respectfully requested that the Court enter an order, under
4 Fed. R. Civ. P. 6(b)(1), expanding the time for the filing of Defendants' responsive pleading until
5 June 24, 2008.

6
7 Dated: April 3, 2008

Respectfully submitted,

8 KAREN P. HEWITT
9 United States Attorney

10 s/ Raven M. Norris
11 RAVEN M. NORRIS
12 Assistant U.S. Attorney
Attorneys for Defendants
Email: Raven.Norris@usdoj.gov

13 Dated: April 3, 2008

14 s/Alan M. Anzarouth
ALAN M. ANZAROUTH
15 Attorney for Plaintiff

16 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
17 of the United States District Court for the Southern District of California, I certify that the content of
18 this document is acceptable to counsel for the Petitioner and that I have obtained authorization from
19 Alan M. Anzarouth to affix his electronic signature to this document.

20 DATED: April 3, 2008

KAREN P. HEWITT
21 United States Attorney

22 s/Raven M. Norris
Assistant U. S. Attorney
23 Attorney for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ATHIL STEPHEN SHABA,) Case No. 08cv0343 JM (BLM)
)
Plaintiff,) CERTIFICATE OF SERVICE
)
v.)
)
PAUL PIERRE, District Director, U.S.)
Citizenship & Immigration Services et al.,)
)
Defendants.)
_____)

IT IS HEREBY CERTIFIED THAT:

I, Raven M. Norris, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the Joint Motion to Extend Time on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Alan M. Anzarouth, Esq.
Email: alan@anzarouthimmlaw.com

I hereby certify that I have caused to be mailed the foregoing, by the United States Postal Service, to the following non-ECF participants on this case:

None

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 3, 2008

s/ Raven M. Norris
RAVEN M. NORRIS